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ENGR TECHNICIAN

Update 07/30/14

This letter is in response to the Order for Compliance (Docket No. V-W-13-AO-22) received from the U.S. Environmental Protection Agency on behalf of Ledgeview Farms, LLC. Brown County was notified by [REDACTED] that on July 18th, 2014 they had received notification from EPA that it disapproves the prior submitted compliance document. Please respond if any other information is needed.

5 bullets were required to be addressed in this document within 10 days.

1. WPDES permit application documents were submitted to the WDNR on 3/18/14 & 3/27/14 & 3/28/14.
2. See attached revised construction compliance schedule below. Brown County has on file a completed and approved NRCS 590 Nutrient Management Plan. It is 419 MB of data. A copy will be sent in the mail separate from this electronic reply as it is too large to send via email from Ag Source (Kevin Beckard CCA)
3. Design costs are being provided by Brown County. Costs are estimated to be between \$5000 - \$7500. Capital costs have been provided and no changes are expected. Operation and Maintenance costs are variable and are part of everyday farm operations and are on-going daily. This I have no expertise in calculating or what needs to be included in this category of costs.
4. The original EPA compliance document was forwarded to WDNR on 3/27/14. WDNR permit application materials sent on 3/18, 3/27, 3/28 2014 are attached to this email. It may take several emails to transfer the data so please be aware of this.
5. Signatures on EPA/WDNR documents were provided on prior submitted materials but, not this document.

COMPLIANCE:

Ledgeview Farms has already implemented interim control of runoff occurring from the upper and lower farms by ramping up cleaning operations and removing cattle off of the concrete feedlots and earthen pasture/exercise lots. Currently a 6 row 120' x 800' modern design freestall barn has been built on the upper farm to relocate and confine all milking, dry and large heifers under roof with no outside access. The existing earthen lots are abandoned and fallow with native vegetation. The gully erosion that is occurring will be addressed with designs and technical assistance from Brown County in the future.

1. Lot A – Upper Farm Map

The animals have been removed and locked off of this area and are confined in the existing and new freestall barns. Future use of the concrete lot will be for minimal cattle traffic if shuttling animals between barns.

2. Lot B – Upper Farm Map

This small heifer/calf yard will be blocked with hay bales to reduce seepages and solids runoff for interim measures. Long term plans are to install a roof over the concrete area for total confinement.

3. Lot C – Upper Farm Map

The animals have been removed and confined in existing farm buildings. This area will no longer be used by cattle. The areas that can be farmed in this area are going to be tilled and crops planted, while the remainder will be allowed to re-vegetate with natives. Gully erosion not healed by re-vegetation will be addressed by NRCS approved designs as appropriate. Brown County LWCD will consult and give technical assistance to Ledgeview Farms through the process.



4. Lot D – Lower Farm Map

A 4895 sq.ft. concrete area discharges feedlot runoff out of an access gate located on the southeast side of the lot, which eventually drains to the road ditch along County Rd V. Plans are to close off this area with a concrete wall to contain the runoff or incorporate into the leachate runoff system.

5. Leachate Runoff

Leachate runoff control design & construction are scheduled for the lower farm meeting NRCS Standard 629. It was discussed that the single bunker located at the upper farm may be abandoned or to restrict use to dry hay only reducing/eliminating leachate issues. The outside walls will be backfilled with clay 3 feet high, top soiled and seeded to prevent seepage losses from the bunker walls and wall/slab interface. See attached planning map for locations.

1. **Bunker A** - Upper Farm Map
2. **Bunker B** – Lower Farm Map

A waste storage facility/site has been surveyed, designed and drafted by Brown County for a 5-6 million gallon earthen clay lined structure meeting NRCS Standard 313. The structures bottom is planned to be lined with a reinforced concrete slab and ramp for manure management. Attached is a plan view of the proposed structure.

Please review and contact me at your convenience if you have any questions, concerns or any further requests for information regarding compliance requirements to the order. Below is a compliance schedule. This information is submitted on Ledgerview Farms request to meet deadline requirements.

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Ledgerview Farms, LLC EPA Schedule of Compliance Timeline 03/04/2014

ANIMAL LOTS

Lot A – Completed

Lot B – Interim practices currently. Design/construct by 9/30/14

Lot C – Completed

Lot D – Interim practices currently. Design/construct by 9/30/14

LEACHATE CONTROLS

Upper Bunker – Design/construct by 10/2014
Lower Bunker – Design/construct by 11/30/14

Current Milkhouse Waste – Contained in 16'1 x 12'w x 8'd concrete tank and land applied.

MANURE STORAGE

Pit#2 – Wall/hole plugged with clay. This facility has ceased being used for manure storage.

Proposed 5-6 Million gallon storage meeting WPDES & NRCS 313 design/construct by 11/30/14

NUTRIENT MANAGEMENT PLAN

Updated plan meeting WPDES & NRCS Std. 590 submitted to WDNR & Brown County.

WPDES PERMIT APPLICATION Submitted to WDNR in March 2014